

**FRED W. ALVAREZ, State Bar No. 068115
TROY A. VALDEZ, State Bar No. 191478
KWANG H. KIM, State Bar No. 233341
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 565-5100
Email: falvarez@wsgr.com
tvaldez@wsgr.com
kkim@wsgr.com
Attorneys for Defendant
SAFECO INSURANCE COMPANY OF
AMERICA**

PETER S. RUKIN, State Bar No. 178336
STEPHANIE DORIA, State Bar No. 196825
RUKIN HYLAND DORIA & TINDALL LLP
100 Pine Street, Suite 725
San Francisco, CA 94111
Telephone: (415) 421-1800
Facsimile: (415) 421-1700

Attorneys for Plaintiff
KIRK LONG

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KIRK LONG, individually, on behalf of all others similarly situated, and on behalf of the general public,

Plaintiff,

 y_1

SAFECO INSURANCE COMPANY OF AMERICA.

Defendant.

CASE NO.: C 07 2746 MJJ

**STIPULATION AND ~~[PROPOSED]~~
ORDER GRANTING DEFENDANT
AN EXTENSION TO AUGUST 2, 2007
TO RESPOND TO COMPLAINT AND
FOR TOLLING**

Complaint Filed: May 24, 2007

WHEREAS, on May 24, 2007, Plaintiff filed this action on behalf of himself and a proposed Fair Labor Standards Act Collective Class (“FLSA Putative Class”) and California Rule 23 Class of Safeco Field Examiners; and

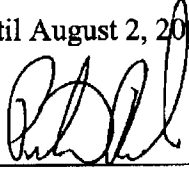
1 WHEREAS, Plaintiff served Defendant with the Complaint on June 15, 2007; and

2 WHEREAS, Defendant has requested an additional 28 days to investigate the allegations
3 of the Complaint to competently respond to the sixty (60) paragraphs of allegations regarding
4 current and former employees around the country;


5 WHEREAS, in exchange for an extension of time to file a responsive pleading to the
6 Complaint, Plaintiff has requested that the statute of limitations for the FLSA Putative Class be
7 tolled for a period of 28 days;

8 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED among the
9 parties, through their attorneys, that Defendant shall have until August 2, 2007 to file a
10 responsive pleading to the Complaint, and that the applicable statutes of limitations or other
11 deadlines for the filing of claims or consents to sue by the members of the FLSA Putative Class
12 are tolled for a period of 28 days, from July 5, 2007 until August 2, 2007.

13
14 Dated: July 5, 2007



Peter Rukin
Attorney for Plaintiff

15
16
17 Dated: July 6, 2007


Fred W. Alvarez
Attorney for Defendant

18
19
20 Good Cause appearing, it is APPROVED and IT IS SO ORDERED

21
22 Dated: July 9, 2007


Honorable Martin J. Jenkins
United States District Court Judge

1 I, Troy A. Valdez, am the ECF User whose identification and password are being
2 used to file this STIPULATION AND [PROPOSED] ORDER GRANTING DEFENDANT AN
3 EXTENSION TO AUGUST 2, 2007 TO RESPOND TO COMPLAINT. I hereby attest that
4 Peter Rukin has concurred in this filing.

5 Dated: July 6, 2007

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: 

Troy A. Valdez

Attorneys for Defendant
SAFECO INSURANCE COMPANY
OF AMERICA